October 27, 2004

To: FCC

Pappas Telecasting Companies' 'donation' of \$325,000 in airtime to Republican candidates in certain areas is yet another example of a powerful media group abusing its privileged access to the public airwaves.

Localism is not served when a corporate headquarters decides to provide one side in local elections a louder voice than others. During election season, local audiences should be offered genuine debate -- not disingenuous offers to "purchase" an equal amount of response time.

Pappas uses the public airwaves free of charge and is obligated by law to serve the public interest. Pappas' actions are legally questionable and cast doubt on whether Pappas truly intends to serve the public interest. Their actions show why we need to strengthen media ownership rules, not weaken them. Further, they show why the license renewal process needs to involve more than just a returned postcard.

Thank you. Mkarrell